

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Albert Russo CN 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee	
In re:  Leonard M Oglesby     <div style="text-align: right;">Debtor(s)</div>	Case No. 20-18767 / MBK  Hearing Date: September 23, 2020 10:00 am  Judge: Michael B. Kaplan  Chapter: 13

**TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN**

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

**The debtor has failed to supply the Trustee with the following document(s):**

**Valuation on handgun and 2 months bank statements from Ally savings acct prior to filing date.**

**Amendments to Schedules B and C to add handgun value.**

**The Schedules fail to account for the debtor(s) tax refund in the amount of \$642 when determining disposable income.**

**The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4): There is non-exempt equity on gun, Stash Investment, TD Ameritrade acct and Ally (pending review of bank statement from Ally, not provided).**

- Valuation statements on Stash Investment and TD Ameritrade accounts prior to filing date.**
- Capital One arrears claim for \$661.64, plan list as outside.**
- Santander arrears claim for \$512.64, plan list as outside.**
- Must file Pre-confirmation certificate.**

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo  
 Standing Chapter 13 Trustee  
 by: Mary Krieger, Staff Attorney